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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

FEB 09 2016

SEATTLE, WASHINGTON
DEPT. OF JUSTICE
YAKIMA, WASHINGTON

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAFAEL CERVANTES,
ERICA GODINEZ,
THOMAS HAROLD PARISIAN,
CHRISTOPHER PAUL PARISIAN,
LAWRENCE WADE RUSSETTE a/k/a
"CHIEF,"
GEORGIE ELAINE RUSSELL,
TYSON JAMES COURCHANE,
LESLEE FAYE PARISIAN a/k/a
LESLEE FAYE PARKER,
ADAM DAVID KETCHUM,
JACOB CHAD PARKER,
KRISTINA DAWN RUSSETTE.

Defendants.

1:16-CR-2006-EFS

INDICTMENT

Cl. 1: 21 U.S.C. § 846 - Conspiracy to
Distribute a Controlled Substance
(Methamphetamine)

21 U.S.C. § 853
Notice of Criminal Forfeiture

The Grand Jury charges:

COUNT 1

From on or about June 1, 2012, and continuing to on or about February 9,
2016, in the Eastern District of Washington, the Defendants,

INDICTMENT

1 RAFAEL CERVANTES,
2 ERICA GODINEZ,
3 THOMAS HAROLD PARISIAN,
4 CHRISTOPHER PAUL PARISIAN,
5 LAWRENCE WADE RUSSETTE a/k/a "CHIEF,"
6 GEORGIE ELAINE RUSSELL,
7 TYSON JAMES COURCHANE,
8 LESLEE FAYE PARISIAN a/k/a LESLEE FAYE PARKER,
9 ADAM DAVID KETCHUM,
10 JACOB CHAD PARKER,
11 KRISTINA DAWN RUSSETTE,

12 knowingly and intentionally combined, conspired, confederated and agreed
13 together and with others, to commit the following offense against the United
14 States, to wit: to knowingly and intentionally distribute 50 grams or more of actual
15 methamphetamine, a Schedule II controlled substance, in violation of Title 21,
16 United States Code, Sections 841(a)(1), (b)(1)(A)(viii), and 846.

17 **NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS**

18 1) The allegations contained in Count 1 of this Indictment are hereby
19 realleged and incorporated by reference for the purpose of alleging forfeitures
20 pursuant to Title 21, United States Code, Section 853.

21 2) Pursuant to Title 21, United States Code, Section 853, upon
22 conviction of an offense in violation of Title 21, United States Code, Sections 841
23 and 846, as alleged in this Indictment, the Defendant, RAFAEL CERVANTES
24 shall forfeit to the United States of America, any property constituting, or derived
25 from, any proceeds obtained, directly or indirectly, as the result of such offense(s)
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1 and any property used or intended to be used, in any manner or part, to commit or
2 to facilitate the commission of the offense(s), including, but not limited to:

3 REAL PROPERTY

4 All that lot or parcel of land, together with its buildings,
5 appurtenances, improvements, fixtures, attachments and easements,
6 commonly known as 174206 53rd PR NW, Grandview, Washington,
7 Assessor's Parcel No. 1-3194-101-3098-001, legally described as
8 follows:

9 Lot 1, Short Plat No. 3098, according to the survey thereof recorded
10 May 9, 2008, under Auditor's File No. 2008-013437, records of
11 Benton County, Washington.

12 3) Pursuant to Title 21, United States Code, Section 853, upon
13 conviction of an offense in violation of Title 21, United States Code, Sections 841
14 and 846, as alleged in this Indictment, the Defendants, RAFAEL CERVANTES,
15 ERICA GODINEZ, THOMAS HAROLD PARISIAN, CHRISTOPHER PAUL
16 PARISIAN, LAWRENCE WADE RUSSETTE a/k/a "CHIEF," GEORGIE
17 ELAINE RUSSELL, TYSON JAMES COURCHANE, LESLEE FAYE
18 PARISIAN a/k/a LESLEE FAYE PARKER, ADAM DAVID KETCHUM,
19 JACOB CHAD PARKER, and KRISTINA DAWN RUSSETTE, shall forfeit to
20 the United States of America, any property constituting, or derived from, any
21 proceeds obtained, directly or indirectly, as the result of such offense(s) and any
22 property used or intended to be used, in any manner or part, to commit or to
23 facilitate the commission of the offense(s).
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1 4) If any forfeitable property, as a result of any act or omission of the

2 Defendants:

3 (a) cannot be located upon the exercise of due diligence;

4 (b) has been transferred or sold to, or deposited with, a third party;

5 (c) has been placed beyond the jurisdiction of the court;

6 (d) has been substantially diminished in value; or

7 (e) has been commingled with other property which cannot be divided
8 without difficulty;

9 the United States of America shall be entitled to forfeiture of substitute property

10 pursuant to Title 21, United States Code, Section 853(p).

11 DATED: February 9, 2016.

12
13 A TRUE BILL
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